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Attorneys for Nominal Defendant Zoran Corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE ZORAN CORPORATION
DERIVATIVE LITIGATION

No. CV 06-05503 WHA

DERIVATIVE ACTION

This Document Relates To:
ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER RE ENLARGEMENT OF
DEADLINES TO COMPLETE
DISCOVERY**

1 WHEREAS, counsel for the Parties have conferred regarding the case schedule in this
2 Action;

3 WHEREAS, on June 6, 2007, this Court entered its amended Case Management Order,
4 establishing deadlines for discovery and expert reports;

5 WHEREAS, on January 11, 2008, the Court moved the deadlines for fact discovery and
6 expert report disclosure to March 14, 2008, and on March, 3, 2008 ordered that “[a]ll deadlines
7 are postponed for four weeks until 3/31/08,” pending the Court’s resolution of the pending
8 Motion For Preliminary Approval of Proposed Settlement (“Motion for Preliminary Approval”);

9 WHEREAS, as of the date of the filing of this Stipulation, the Court had not ruled on the
10 pending Motion for Preliminary Approval;

11 WHEREAS, at the time that the Motion for Preliminary Approval was filed, Plaintiff had
12 noticed 18 depositions and Defendants had noticed five depositions;

13 WHEREAS, the party and third party depositions will need to be rescheduled based upon
14 the witnesses’ availability;

15 WHEREAS, the Parties anticipate that motions for protective order may be filed on
16 behalf of some third party witnesses in the event the Parties are not able to reach agreement on
17 the scheduling of such depositions;

18 WHEREAS, some of the party witnesses reside outside this country so that additional
19 travel time may be required to schedule these depositions;

20 WHEREAS, the Parties agree that good cause exists for this request for an extension of
21 time and that ample time for completion of discovery and depositions of relevant witnesses is in
22 the best interest of the Company and shareholders for whom this litigation is brought;

23 NOW, THEREFORE, the Parties hereby stipulate that the time period for the Parties to
24 conduct discovery and for submission of opening expert reports be extended to May 2, 2008, and
25 that all other deadlines be extended accordingly.
26
27
28

1 March 31, 2008

/s/ Juli E. Farris

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6
7 March 31, 2008

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15 March 31, 2008

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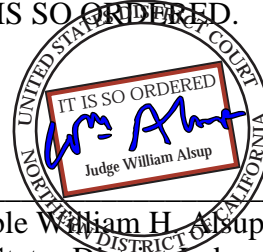
GENERAL ORDER 45 ATTESTATION

Pursuant to General Order 45, Section X.B., I hereby attest that I have obtained concurrence in the efilng of this document from the above signatories, Susan Muck and Steven Kaufhold.

/s/ Juli E. Farris
Juli E. Farris (CA Bar No. 141716)

PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

DATED: April 1, 2008.



Honorable William H. Alsup
United States District Judge